

**From:** Hall, Samuel C.  
**To:** kmotley motleylegal.com; Meyer, Brianna J.; McGaver, Steven C.; Nathaniel Cade; Antonique Williams; Annalisa Pusick  
**Subject:** RE: Motion for Leave to Amend - Justin Blake  
**Date:** Sunday, March 05, 2023 2:13:54 PM  
**Attachments:** image001.png  
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image003.png  
biocc\_93785f5f-ed97-44c3-b4d6-5b1caa34746d.png  
vcardcc\_043e3bb0-e5e2-4373-8ce7-c0d94f1c7161.png  
ccclear\_34872598-c773-474b-a10a-fafc8807566f.png

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Hi Kim,

The proper insurance company is: Wisconsin Municipal Mutual Insurance Company.

Thanks,  
Sam

**Samuel C. Hall, Jr. | Managing Partner**

SHall@CrivelloCarlson.com  
Direct: 414-290-7587



**Crivello Carlson, S.C.**

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**From:** kmotley motleylegal.com <kmotley@motleylegal.com>  
**Sent:** Thursday, March 2, 2023 2:47 PM  
**To:** Hall, Samuel C. <SHall@CrivelloCarlson.com>; Meyer, Brianna J. <BMeyer@crivellocarlson.com>; McGaver, Steven C. <SMcGaver@CrivelloCarlson.com>; Nathaniel Cade <nate@cade-law.com>; Antonique Williams <antonique@cade-law.com>; Annalisa Pusick <annalisa@cade-law.com>  
**Subject:** Re: Motion for Leave to Amend - Justin Blake

Hello Sam,

Certainly, if the insurance for the County that we named is incorrect we would like to correct that as well. If you could please provide that information I would greatly appreciate it. Thanks.

Kim

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**From:** Hall, Samuel C. <SHall@CrivelloCarlson.com>  
**Sent:** Thursday, March 2, 2023 3:43 PM  
**To:** kmotley motleylegal.com <kmotley@motleylegal.com>; Meyer, Brianna J. <BMeyer@crivellocarlson.com>; McGaver, Steven C. <SMcGaver@CrivelloCarlson.com>; Nathaniel Cade <nate@cade-law.com>; Antonique Williams <antonique@cade-law.com>; Annalisa Pusick <annalisa@cade-law.com>

**Subject:** RE: Motion for Leave to Amend - Justin Blake

Kim,

Will you also be naming the correct insurance carrier for the County?

Thanks

Sam

**Samuel C. Hall, Jr. | Managing Partner**

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**From:** kmotley motleylegal.com <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>

**Sent:** Thursday, March 02, 2023 2:29 PM

**To:** Hall, Samuel C. <[SHall@CrivelloCarlson.com](mailto:SHall@CrivelloCarlson.com)>; Meyer, Brianna J. <[BMeyer@crivellocarlson.com](mailto:BMeyer@crivellocarlson.com)>; McGaver, Steven C. <[SMcGaver@CrivelloCarlson.com](mailto:SMcGaver@CrivelloCarlson.com)>; Nathaniel Cade <[nate@cade-law.com](mailto:nate@cade-law.com)>; Antonique Williams <[antonique@cade-law.com](mailto:antonique@cade-law.com)>; Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>

**Subject:** Motion for Leave to Amend - Justin Blake

Hello Brianna, Samuel, and Steven,

It has come to our attention that NaphCare was not the medical service provider of the Kenosha Secure Detention nor the employer of Bergmann on April 25, 2021 when Mr. Blake was arrested. We plan to file a motion for leave to amend our complaint filed on 2/15/23 and replace NaphCare with the appropriate Defendants. I am reaching out to see if you would object to our motion. We do not plan to make any other substantive changes to the complaint and only plan to name the appropriate parties.

Please let me know your thoughts as we would like to file this soon. Thank you!

--

Best,

Kim

Kimberley Cy Motley, Esq.

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